PRESENTMENT DATE AND TIME: November 7, 2014 at 12:00 noon (Eastern Standard Time) OBJECTION DATE AND TIME: November 7, 2014 at 11:30 a.m. (Eastern Standard Time)

KING & SPALDING LLP

1185 Avenue of the Americas

New York, New York 10036

Telephone: (212) 556-2100

Facsimile: (212) 556-2222

Arthur Steinberg Scott Davidson

KIRKLAND & ELLIS LLP

300 North LaSalle Chicago, IL 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Richard C. Godfrey, P.C. (admitted *pro hac vice*) Andrew B. Bloomer, P.C. (admitted *pro hac vice*)

Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

-----X

In re : Chapter 11

MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (REG)

f/k/a General Motors Corp., et al.

Debtors. : (Jointly Administered)

-----X

NOTICE OF PRESENTMENT OF ORDER GRANTING APPLICATION BY GENERAL MOTORS LLC TO ENFORCE THE COURT'S SEPTEMBER 15, 2014 SCHEDULING ORDER REGARDING MOTION OF GENERAL MOTORS LLC PURSUANT TO §§ 105 AND 363 TO ENFORCE THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION (MONETARY RELIEF ACTIONS, OTHER THAN IGNITION SWITCH ACTIONS) AS IT APPLIES TO RANDY WATSON AND LINDA WATSON

PLEASE TAKE NOTICE that, based on the annexed Application, dated November 4, 2014 ("Application"), the proposed Order Granting Application By General Motors LLC To Enforce The Court's September 15, 2014 Scheduling Order Regarding Motion of General Motors LLC Pursuant to §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and

Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) as it applies to Randy Watson and Linda Watson, a copy of which is annexed to the Application as Exhibit "F," will be presented for signature and entry to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on November 7, 2014 at 12:00 noon (Eastern Standard Time).

PLEASE TAKE FURTHER NOTICE that objections or proposed counter-orders must be made in writing and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq.); and (ii) Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654 (Attn: Richard C. Godfrey, Esq.), so as to be received no later than November 7, 2014, at 11:30 a.m. (Eastern Standard Time) ("Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed before the Objection Deadline, the Court may schedule a hearing thereon at a date and time to be determined, if it believes such hearing is necessary under the circumstances.

Dated: New York, New York November 4, 2014

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg Scott Davidson KING & SPALDING LLP 1185 Avenue of the Americas New York, New York 10036 Telephone: (212) 556-2100

Facsimile: (212) 556-2222

-And-

Richard C. Godfrey, P.C. (admitted *pro hac vice*) Andrew B. Bloomer, P.C. (admitted *pro hac vice*) KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, IL 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200

Attorneys for General Motors LLC